

EXHIBIT B

Martinelli, Adria B.

From: Martinelli, Adria B.
Sent: Wednesday, January 02, 2008 3:34 PM
To: 'Jim Hall'
Cc: Yuen, Katherine; Bowser, William
Subject: Riley v. DRBA

Jim:

Your responses to my discovery requests filed on June 28, 2007 remain incomplete, despite my multiple requests and your promises for additional information. By way of reminder, I also requested the following items referenced in Mr. Riley's Dec. 6 deposition:

1. Records related to Riley's 2001 auto accident including settlement information.
2. Records related to Riley's 1999 auto accident including settlement information - you stated that Gary Nitsche was the attorney and that you would contact him to get the documents.
3. Copy of the phone bill Riley contends he shouldn't have had to pay because he received calls from Alex Coles while Coles was in California.
4. 2007 grievance related to pay
5. Copy of e-mail mentioned in P8-9, and the paragraph related to 10/23/06 incident
6. Copy of Ltr Riley sent to Shahan related to P46.
7. Riley's response e-mail to D357 (Final determination). Riley says he sent a response to the final determination.

Initially, you stated you would provide Mr. Riley's medical records, but indicated at the deposition that you did not have any in your possession. You agreed to have Mr. Riley sign a medical release so that we could attempt to obtain the medical records, and then provided one which was not witnessed. My paralegal sent several emails and left messages regarding this oversight, but has yet to receive a response from your office. Thus, we have been unable to move forward in seeking these records.

Due to your lack of response, I have no recourse but to contact Judge Thyng's chambers and schedule a telephone conference regarding these outstanding discovery issues. I will be contacting her chambers tomorrow.

Adria

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